

EXHIBIT “A”

374973

LYNCH LYNCH HELD ROSENBERG, P.C.

BRIAN A. HELD, ESQ.

NJ ATTORNEY ID# 017472000

440 State Route 17 North

Hasbrouck Heights, NJ 07604

Tel.: (201) 288-2022

Attorneys for Plaintiff,

PRISCILLA PERIUT

PRISCILLA PERIUT,

Plaintiff,

-VS-

JONATHAN H. SCHMIDT, QUALITY
CARRIERS, INC., "JOHN DOES 1-10"
(fictitious names, true names unknown), and/or
"ABC CORPORATIONS 1-10" (fictitious
names, true names unknown),

Defendants.

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: HUDSON COUNTY
:

: DOCKET NO.: HUD-L-244-22
:

: Civil Action
:

: **SUMMONS**
:

FROM THE STATE OF NEW JERSEY, To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within **35 days** from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: February 18, 2022

/s Michelle M. Smith, Esq.
Clerk of the Superior Court

Name of Defendant to be served:
Address of Defendants to be served:

JONATHAN H. SCHMIDT
57 JOHN STREET
DALTON, MA 01226

QUALITY CARRIERS, INC.
1861 TERRY DRIVE
JOLIET, IL 60436

**DIRECTORY OF SUPERIOR COURT DEPUTY CLERK'S OFFICES
COUNTY LAWYER REFERRAL AND LEGAL SERVICES OFFICES**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL

(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL

(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862
LEGAL SERVICES
(800) 496-4570

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice 1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 964-4520
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL

(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL

(856) 692-6207
LEGAL SERVICES
(856) 451-0003

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6204
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRA
L (856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House--1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL
(908) 735-2611
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court, Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington and Court Streets
P. O. Box 910
Morristown, NJ 07963-0910

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191

LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL
(856) 678-8363
LEGAL SERVICES
(856) 451-0003

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(908) 475-2010

LYNCH LYNCH HELD ROSENBERG, P.C.
BRIAN A. HELD, ESQ.
NJ ATTORNEY ID# 017472000
440 State Route 17 North
Hasbrouck Heights, NJ 07604
Tel.: (201) 288-2022
Attorneys for Plaintiff,
PRISCILLA PERIUT

PRISCILLA PERIUT,

Plaintiff,

-vs-

JONATHAN H. SCHMIDT, QUALITY
CARRIERS, INC., "JOHN DOES 1-10"
(fictitious names, true names unknown), and/or
"ABC CORPORATIONS 1-10" (fictitious
names, true names unknown),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY

Docket No.: HUD-L-244-22

CIVIL ACTION

**MOTOR VEHICLE ACCIDENT
COMPLAINT; DEMAND FOR TRIAL
BY JURY; DESIGNATION OF TRIAL
ATTORNEY**

Plaintiff, PRISCILLA PERIUT, residing at 300 Somerset Street, in the Town of Harrison, County of Hudson and State of New Jersey, complaining of the Defendants, JONATHAN H. SCHMIDT, QUALITY CARRIERS, INC., "JOHN DOES 1-10" (fictitious names, true names unknown), and/or "ABC CORPORATIONS 1-10" (fictitious names, true names unknown), deposes and say:

FIRST COUNT

1. On or about June 20, 2020, Plaintiff, PRISCILLA PERIUT, was the driver of a certain 2013 Toyota motor vehicle which was traveling southbound on Route 17 the Borough of

Hasbrouck Heights, County of Bergen, and State of New Jersey.

2. On or about June 20, 2020, Defendant, JONATHAN H. SCHMIDT, was the operator of the 2012 Peterbuilt Truck which was traveling southbound on Route 17 the Borough of Hasbrouck Heights, County of Bergen, and State of New Jersey.

3. On or about June 20, 2020, Defendant, QUALITY CARRIERS, INC., was the owner of the 2012 Peterbuilt Truck which was traveling southbound on Route 17 the Borough of Hasbrouck Heights, County of Bergen, and State of New Jersey.

4. On or about June 20, 2020, Defendant, JONATHAN H. SCHMIDT, was acting as the agent of Defendant, QUALITY CARRIERS, INC., the owner of the 2012 Peterbuilt Truck which was traveling southbound on Route 17 the Borough of Hasbrouck Heights, County of Bergen, and State of New Jersey.

5. JOHN DOES 1-10 and/or ABC CORPORATIONS 1-10, fictitious names are designated as the unknown owners, operators, employers, principals, or agents of the aforementioned 2012 Peterbuilt Truck which was traveling southbound on Route 17 the Borough of Hasbrouck Heights, County of Bergen, and State of New Jersey.

6. Defendants, JONATHAN H. SCHMIDT, QUALITY CARRIERS, INC., "JOHN DOES 1-10" (fictitious names, true names unknown), and/or "ABC CORPORATIONS 1-10"

(fictitious names, true names unknown), did so negligently and carelessly own, operate, and/or maintain the aforementioned motor vehicle so as to cause or contribute to the collision with the vehicle of Plaintiff, PRISCILLA PERIUT.

7. As a direct and proximate result of the negligence of the Defendants, JONATHAN H. SCHMIDT, QUALITY CARRIERS, INC., "JOHN DOES 1-10" (fictitious names, true names unknown), and/or "ABC CORPORATIONS 1-10" (fictitious names, true names unknown), as aforesaid, Plaintiff, PRISCILLA PERIUT, was caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization, and medication, and have been and will in the future continue to be hampered in her daily routines.

WHEREFORE, Plaintiff, PRISCILLA PERIUT, demand judgment against the Defendants, JONATHAN H. SCHMIDT, QUALITY CARRIERS, INC., "JOHN DOES 1-10" (fictitious names, true names unknown), and/or "ABC CORPORATIONS 1-10" (fictitious names, true names unknown), in the amount of her damages together with interest and costs of suit.

LYNCH LYNCH HELD ROSENBERG, P.C.
Attorneys for Plaintiff,

By: 
BRIAN A. HELD, ESQ.

Dated: January 20, 2022

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a Trial by jury as to all issues.

NOTICE OF TRIAL COUNSEL

Please take notice that ARTHUR V. LYNCH, ESQ., NJ ATTORNEY ID# 038851988 is hereby designated as Trial Counsel in the above-captioned matter for **LYNCH LYNCH HELD ROSENBERG, P.C.**, pursuant to R.4:25 et. seq.

**DEMAND FOR ANSWERS TO UNIFORM AND SUPPLEMENTAL
INTERROGATORIES**

PLEASE TAKE NOTICE that pursuant to Rule 4:17-1(b)(ii)(2), Plaintiff hereby demands answers to **Uniform Interrogatories Form C and Form C(1)** within sixty (60) days of the filing of Defendant's Answer to this Complaint.

CERTIFICATION

Pursuant to the requirements of Rule 4:5-1 (NOTICE OF OTHER ACTIONS), I, the undersigned, do hereby certify to the best of my knowledge, information and belief, that except as hereinafter indicated, the subject matter of the controversy referred to in the within pleading is not the subject of any other Cause of Action, pending in any other Court, or of a pending Arbitration Proceeding, nor is any other Cause of Action or Arbitration Proceeding contemplated;

1. OTHER ACTIONS PENDING?.....YES ____NO X

A. If YES - Parties to other Pending Actions.

B. In my opinion, the following parties should be joined in the within pending Cause of Action.

2. OTHER ACTIONS CONTEMPLATED?.....YES ____NO X

A. If YES - Parties contemplated to be joined, in other Causes of Action.

3. ARBITRATION PROCEEDINGS PENDING?.....YES ____NO X

A. If YES - Parties to Arbitration Proceedings.

B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings.

4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED? YES ____NO X

A. If YES - Parties contemplated to be joined to Arbitration Proceedings.

In the event that during the pendency of the within Cause of Action, I shall become aware of any change as to any facts stated herein, I shall file an amended certification and serve a copy thereof on all other parties (or their attorneys) who have appeared in said Cause of Action.

LYNCH LYNCH HELD ROSENBERG, P.C.
Attorneys for Plaintiff,

By: 
BRIAN A. HELD, ESQ.

DATED: January 20, 2022

Civil Case Information Statement

Case Details: HUDSON | Civil Part Docket# L-000244-22

Case Caption: PERIUT PRISCILLA VS SCHMIDT

JONATHAN

Case Initiation Date: 01/20/2022

Attorney Name: BRIAN A HELD

Firm Name: LYNCH LYNCH HELD ROSENBERG, PC

Address: 440 STATE ROUTE 17 NORTH

HASBROUCK HEIGHTS NJ 07604

Phone: 2012882022

Name of Party: PLAINTIFF : Periut, Priscilla

Name of Defendant's Primary Insurance Company

(if known): Bay Insurance Risk Retention Group

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Priscilla Periut? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

01/20/2022

Dated

/s/ BRIAN A HELD

Signed

EXHIBIT “B”

D.O.A.: June 20, 2020

D.O.B.:December 18, 1990

Priscilla Periut

MAT-20062323799 (Automobile Accident)

Primary:	Geico Insurance Company
Benefits:	PIP-\$15K *Health Ins. Primary*
Co-Pays/Deds:	\$250 Ded+\$950 Copay=\$1,200

Secondary:	
Benefits:	
Co-Pays/Deds:	

1	Cigna/Conduent Lavinia Banks/Case ID:24237674 P: 801.562.6556 F:	\$4,661.03 as of 9.17.21
2	Hackensack University Med Ctr. Acct# 2005119036 Sharon P: 551.996.3355 F: 5519963423	Zero Balance
3	North Jersey Ortho Specialists, PA Lyndy P: 2017846800 F: 2017846801	Zero Balance
4	University Radiology P: 2018362500 F:	No Records found
5	Jag One PT Taryn/Acct# 54P4771853 P: 8554098974 F: 8553967680	Zero Balance
6	Kayal Orthopaedic Ctr. Ray P: 2015600711 F: 2014451400	\$130,000.00
7	Patient Care Associates Maria P:201-567-8090 F: mgodwin@pcaasc.com	\$58,406.00
8	Binodal Pain Management/Bergen Anesthesia BP-2990	\$14,735.00 \$425.00 for covid test

	PA-3914 Beatrice P: 201.342.1205 F: 201.820.2665	
	Total:	\$208,227.03

Notes: